

*Received 7/18/05***DEPARTMENT OF FOOD AND AGRICULTURE**

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July 14, 2005

Attn: Paul Dabbs  
Chief, Water Resources Evaluation Branch  
Statewide Water Planning Branch  
California Department of Water Resources  
P.O. Box 942836  
Sacramento, CA 94236-0001

Dear Mr. Dabbs:

The Department of Food and Agriculture (CDFA) is pleased to provide comments on the Public Review Draft of the California Water Plan Update 2005 (2005 Water Plan). CDFA supports the regionalized approach advocated by the Department of Water Resources (DWR) and the implementation of multiple strategies to effectively manage water resources. Local communities are most familiar with the unique and complex hydrology of their particular watershed(s) and will implement the most feasible strategies to ensure a sustainable water supply. However, CDFA recommends the 2005 Water Plan should focus on (1) the sustainability of urban and environmental water supplies in order to reduce the need for future ag to urban water transfers and (2) revisit the projected water needs of agriculture to the year 2030.

In contrast to previous Water Plans, the 2005 edition does not attempt to quantify the difference between projected future water supplies and water needs (gap analysis). The state as a result, may be less prepared to implement proactive water management actions to mitigate the effects of future water shortages. Bulletin 160-98 forecasted water shortages in California by 2020 and identified water management options such as land use planning to reduce the magnitude of the shortage. The absence of a gap analysis in the 2005 Water Plan may as a result, place additional pressure on the agriculture community to provide water to satisfy environmental and urban water needs. The increased number of agriculture to urban water transfers will in turn increase farmers' reliance on groundwater for irrigating their crops, further exacerbating the groundwater overdraft problem in the state, or further retirement of highly productive agricultural land.

The 2005 Water Plan predicts a significant reduction in agricultural water use between 2000 and 2030. CDFA contends that even though agriculture is becoming increasingly

water use efficient, the magnitude of the reduction displayed graphically in the California Water Plan Highlights (pg. 5) is not reflective of actual conditions. In addition, authors of the 2005 Water Plan should describe in the text adjoining the graphic what exactly will contribute to those significant reductions in agricultural water use. More efficient land use patterns for urban development and the emerging bio-energy market are trends that can result in maintaining, or even expanding irrigated acreage. A discussion of the uncertainty of the projections presented for each scenario and for each resource management strategy would be appropriate.

In 1990, AB 3616, otherwise known as the Agricultural Efficient Water Management Act became law. The goal of this legislation was to improve agricultural water management and water use efficiency in California. One of the provisions of this bill was to establish an advisory committee comprised of representatives from state, federal, local agencies, environmental and public interest groups, agricultural communities, and other interested parties, to develop a list of efficient water management practices for agricultural water suppliers. Former Governor Wilson directed this Ag Water Management Council (AWMC) to develop a Memorandum of Understanding between agricultural and environmental communities to further address efficient use of agricultural water statewide. The AWMC has been very successful in promoting the water management program to the agricultural industry. Water supplier membership has grown over 20 percent and over a half million irrigated acres have been added to the program since 2001. Currently, a total of 4.2 million retail irrigated acres are enrolled in the program, accounting for over half of the irrigated acreage in the state. The eventual goal is to enroll all of California's irrigated acreage in the AWMC program.

The success of the AWMC demonstrates that widespread adoption of water use efficient practices in agriculture has been in effect for several years. Certainly, there are water suppliers and farmers who have not yet adopted water use efficient practices, but they would represent only a small portion of the nearly 4 million acre-feet in predicted water savings under the current trend scenario. Even with increased agricultural production (resource intensive scenario) the 2005 Water Plan projects agricultural water needs will be reduced by approximately 2 million acre-feet annually with the implementation of naturally occurring conservation practices. These projections appear overly optimistic and may encourage the perception that agriculture will fill the void for urban and environmental water needs.

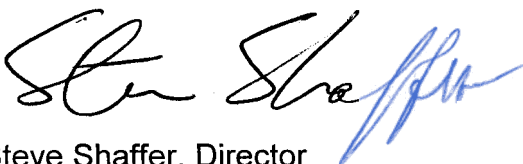
According to DWR estimates (graphic, pg. 5) an additional 2 million acre-feet per year is needed to eliminate the statewide groundwater overdraft. On page 15 of the document another graphic depicts the water supply benefits of eight resource management strategies. If one were to compare the two bar charts it would appear that implementation of all eight of the resource management strategies would more than compensate for the significant statewide overdraft of groundwater. However, even though all of the resource management strategies are linked, the water savings projected with their implementation are not additive. For example, increased urban

water use efficiency will reduce the need for urban water suppliers to look elsewhere for water sources such as with agriculture to urban water transfers. This ripple effect among the resource management strategies means water savings will be shared instead of stand alone, as portrayed in the graphic. The bar chart is in a sense, misleading, because the eight resource management strategies are displayed as distinct when they are in fact integrated and the water savings benefits in this format appear exaggerated. Perhaps a graphic displaying a melding of water savings benefits achieved with the implementation of the eight resource management strategies would be more appropriate. Also, an additional bullet should be added to reduce water demand on page 15 that identifies Managed Environmental Water Use Efficiency. This is a large water demand as identified on page 2, with associated potential efficiency improvements.

CDFA commends the Department of Water Resources management and staff that lead and supported development of the Plan. It is a comprehensive and extensive work that provides a tremendous amount of information and analysis in the five volumes. I was a member of the Advisory Committee and appreciate the opportunity to participate in this manner as well as in helping draft the Agricultural Lands Stewardship Resource Management Strategy.

Thank you for the opportunity to comment on the 2005 Water Plan. If you have any questions, please contact Matthew Reeve of my staff at (916) 651-9446.

Sincerely,



Steve Shaffer, Director  
Office of Agriculture and Environmental Stewardship